



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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Ref: 8EPR-N

Rowdy Wood, Range Specialist  
Columbine Ranger District  
San Juan National Forest  
P.O. Box 439  
367 Pearl Street  
Bayfield, CO 81122

Re: Hermosa Landscape Grazing Analysis  
Final EIS: CEQ #20090168

Dear Mr. Wood:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Hermosa Landscape Grazing Analysis in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C 4231 and Section 309 of the Clean Air Act.

The Columbine Ranger District selected Alternative 3 – Adaptive Management that authorizes continued permitting of livestock grazing by incorporating adaptive management strategies. EPA is supportive of the Ranger District's direction to improve and protect the natural environment in the forest. EPA is encouraged by the Forest Service's efforts to protect the damaged stream segments by removing cattle from the Hope Creek and South Fork allotments.

The FEIS identifies the selected alternative as the "adaptive management alternative" (p.22) and indicates that adaptive management will be used in implementing the decision. EPA's October 23, 2008, comment letter on the Draft EIS asked that specific resource thresholds be set as part of the adaptive management program. Our review of the FEIS did not find the inclusion of resource or management thresholds in the adaptive management alternative. The ROD does contain limited components of an adaptive management plan. The thresholds and timeline for improvements were not available for public review prior to the ROD; however there are a few examples of an adaptive management threshold in the ROD. For example, the ROD lists on page 5, a specific action "close the Dutch Creek Allotment" that will be taken if riparian sites are not in at least "functioning at risk" condition "with an upward trend" by a specific date (2018).

We have found that effective adaptive management plans include:

- a decision tree to guide future decisions with specific decision thresholds for each impacted resource;
- a monitoring plan with protocols to assess whether thresholds are being met;
- a commitment to specific action if thresholds are not being met; and
- a firm commitment of resources for the required monitoring along with a plan for more environmentally conservative management if monitoring resources are not available.

Without the components of adaptive management listed above, it is not clear how the proposed management system differs from traditional management practices. We strongly recommend that the implementation plan for this project include a more rigorous adaptive management program including the components listed above.

EPA is concerned with the decision period for altering management on two allotments with stream segments that are not currently in good functioning condition. The ROD proposes management changes on the Elbert Creek and Dutch Creek Allotments if they do not meet specific improvements by 2018. Because there is no action required before 2018 - even if the conditions decline in the 9 years between now and then - it seems possible these watersheds could experience little or no improvement over this period. We recommend that the implementation plan include some interim thresholds to demonstrate a trend of improvement, or require additional management measures if improvement is not being seen.

Finally, EPA recognizes that this project includes a number of measures to mitigate watershed damage from past management practices. For example, on page 6 of the ROD, EPA supports relocating the Upper Elbert Creek Segment of trail out of the stream bottom by September 2011. From this and other efforts in this project, EPA believes the Forest is showing a commitment to improving riparian and upland conditions. There is local interest and public concern for maintaining good water quality in the watershed basin. EPA encourages the Forest Service to consider establishing a water quality monitoring effort to document existing conditions and to track effectiveness of the adaptive management approach, and we encourage the Forest to take action to speed the needed improvements to restore conditions to the Forest's desired conditions.

We appreciate the opportunity to participate in this analysis. If you have any questions or would like to discuss our comments, please contact me (303-312-6004) or Sarah Hester (303-312-6008) of my staff.

Sincerely,

Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection  
and Remediation